

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-80053-CR-CANNON

UNITED STATES OF AMERICA

vs.

THOMAS PETER KATSAMPES,

Defendant.

/

FACTUAL PROFFER

The United States of America and Thomas Peter KATSAMPES (“Defendant” or “KATSAMPES”) agree that if this case had gone to trial, the United States would have proven the following facts beyond a reasonable doubt:

1. At all relevant times, “Website A” was a website dedicated to child pornography, as defined in 18 U.S.C. § 2256(8)(A), and the discussion of child sexual abuse. Users of Website A could engage in online communications with other users. Users trafficked in child pornography via Website A by posting web links within messages. These links redirected to other websites, such as file-hosting websites, where the linked-to child pornography images and videos were available for download and/or viewing. Under the rules of Website A, the links were required to contain descriptive text that provided information about the sexual acts and age and gender of the child victim depicted in the linked-to child pornography files. During the timeframe relevant to this matter, Website A users made tens or hundreds of thousands of child pornography images and videos available in this manner. At all relevant times, Website A had at least 100 registered members and was operated and managed by a smaller subset of particularly active or established users referred to as “staff” and “moderators.” Guest users of Website A were promoted to

membership or moderating positions based on their active involvement on the site, and in particular by sharing child pornography with other users on the site. Website A ceased operating in its current form in approximately November 2022.

2. Starting in at least 2018 until approximately July 2022, a high-ranking administrator of Website A resided in Palm Beach County, Florida, within the Southern District of Florida, where he advertised and distributed child pornography and took acts to help manage Website A from his home.

3. KATSAMPES first registered an account on Website A in approximately February 2022. Through his active participation on Website A, KATSAMPES earned an elevated membership status in approximately November 2022.

4. On numerous occasions, KATSAMPES shared child pornography over Website A. These incidents include the following:

a. On or about June 3, 2022, KATSAMPES emailed another Website A user with the subject line “us?” using Website A’s email function. The email contained a link, which redirected to another webpage containing 25 images of prepubescent girls laying on a bed. One of the girls is estimated to be between eight and 10 years of age while the other is estimated to be between five and seven. The girls are fully nude or partially nude in every image. Two of the images are close ups of the older girl’s exposed vagina. In multiple images, the girls are digitally manipulating each other’s vaginas and in two, the younger girl is spreading the older girl’s labia in what appears to be an effort to further expose the older girl’s vagina for the camera.

b. On or about September 27, 2022, KATSAMPES posted a link in a “Members Only” room with more than 10 users tagged “[hebe],” “[girl],” and “[fingering],” and the comment “*girl gets her pretty slit toyed.*” “Hebe” is short for “hebophile” or “hebophilia,”

which in turn refers to a sexual interest in early pubescent minors or a person who has such a sexual interest. An undercover FBI agent accessed this link, which redirected to another website containing a contact sheet. A “contact” sheet is a collage of screenshots taken from a video, and which serves a preview for what that video depicts. The contact sheet available at the link included eight images depicting a fully nude, prepubescent girl, estimated to be between the ages of eight and 10. An adult man is inserting phallic objects into the girl’s anus and/or vagina in seven of the screen captures. In the eighth image, the adult male is digitally manipulating the girl’s vagina and the image has words stating “*masked Girl Rides Again Part 2*” superimposed over the image.

c. On or about October 13, 2022, the SUBJECT USER posted a link in a “Members Only” room with more than 10 users tagged “[tween],” “[girl],” and “[bj],” and the comment “*he has a cute lil playmate :-P.*” An undercover FBI agent accessed this link, which redirected to a contact sheet containing 16 images depicting a prepubescent girl estimated to be between the ages of seven and nine. In multiple images, the girl performs oral sex on an adult man’s penis. In one of the images, the girl’s legs are spread wide apart and her vagina is prominently exposed for the camera. The girl has no noticeable pubic hair and young bodily and facial features.

5. Further, beginning on an unknown date and continuing until the date of his arrest on or about June 6, 2024, KATSAMPES possessed four electronic devices in his residence in the District of Minnesota that were used to engage in the above and related conduct and that contained thumbnail images depicting child sexual abuse, including the following:

a. An image depicting a young girl who appears to be approximately 7 to 10 years old. In the image, the girl is entirely naked and is spreading her legs to expose her naked genitals to the camera. She is also holding a marker near her genitals.

b. An image depicting a young girl who appears to be approximately 3 to 5 years old. The girl appears to be naked and her hands are on an adult man's naked, erect penis. The girl's mouth is very close to the man's penis.

c. An image depicting a young girl who appears to be approximately 4 to 7 years old. In the image, the girl is entirely naked with her legs spread to expose her naked genitals to the camera. She appears to be manually manipulating her genitals.

6. A "thumbnail" image is a small version of an image that is automatically created by the computer operating system from a larger version of that image that was present at some point in time on the device.

7. The devices KATSAMPES used for the purposes set forth above include the following:

- a. One Lenovo laptop, S/N PW02GHZ9, containing a Western Digital 256 GB NVMe SSD, S/N: 22115L803495;
- b. One 64 GB USB thumb drive;
- c. Two Micro Center 126 GB USB thumb drives.

8. Based on these facts and other information known to the parties, KATSAMPES agrees that, had this case gone to trial, the government would have proven beyond a reasonable doubt, as to Count 1 of the Superseding Indictment, that KATSAMPES conspired to advertise child pornography in violation of Title 18, United States Code, Section 2251(d) and (e), beginning in at least February 2022 and continuing through on or about November 14, 2022, such that:

- a. two or more persons in some way agreed to try to accomplish a shared and unlawful plan;
- b. the Defendant knew the unlawful purpose of the plan and willfully joined in it.

And that the unlawful purpose of the plan was to commit the offense of advertising child pornography in violation of Title 18, United States Code, Section 2251(d) and (e), such that:

- a. the Defendant knowingly made, printed, or published, or caused to be made, printed, and published, a notice or advertisement seeking or offering;
- b. to produce, display, distribute, or reproduce any visual depiction involving the use of a minor engaged in sexually explicit conduct, and the visual depiction is of such conduct; and
- c. the Defendant knows or has reason to know that the notice or advertisement would be transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer or mailed; or
- d. such notice or advertisement was transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer or mailed.

9. Based on these facts and other information known to the parties, KATSAMPES also agrees that, had this case gone to trial, the government would have proven beyond a reasonable doubt, as to Count 2 of the Superseding Indictment, that KATSAMPES conspired to distribute child pornography in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1), beginning in at least February 2022 and continuing through on or about November 14, 2022, such that:

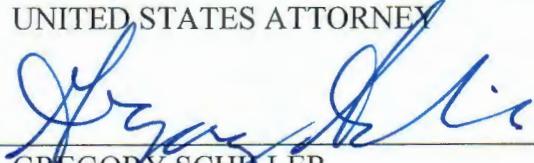
- a. two or more persons in some way agreed to try to accomplish a shared and unlawful plan;
- b. the Defendant knew the unlawful purpose of the plan and willfully joined in it.

And that the unlawful purpose of the plan was to commit the offense of distributing child pornography in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1), such that:

- a. the Defendant knowingly distributed an item or items of child pornography;
- b. the item or items of child pornography had been distributed using any means or facility of interstate or foreign commerce or had been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer; and
- c. when the Defendant distributed the items, the Defendant believed the items were or contained child pornography.

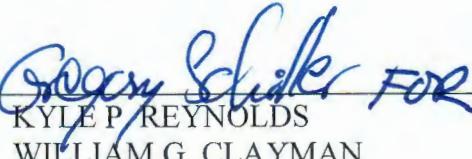
Date: 2/27/25

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: 

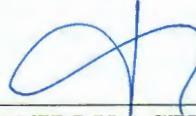
GREGORY SCHILLER
ASSISTANT UNITED STATES ATTORNEY

Date: 2/27/25

By: 

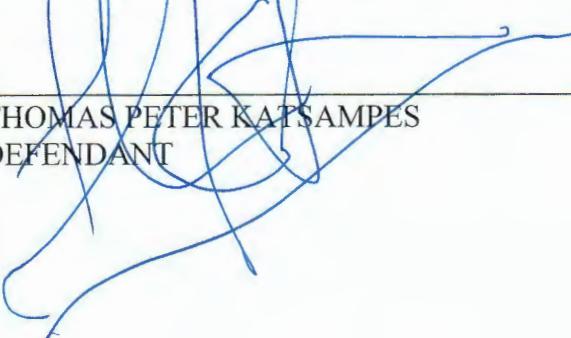
KYLE P. REYNOLDS
WILLIAM G. CLAYMAN
TRIAL ATTORNEYS, U.S. DEP'T OF JUSTICE

Date: 2/27/25

By: 

KIMBERLY ACEVEDO
JOHN PATRICK MUSCA
ATTORNEYS FOR DEFENDANT

Date: 2/27/25

By: 

THOMAS PETER KATSAMPES
DEFENDANT